REMARKS

Reconsideration is respectfully requested.

In this response, claims 1, 10, 15 have been amended, and new claims 21-29 added. Accordingly, claims 1-29 remain pending in this application for reconsideration. Support for new claims may be found at least at page 12, lines 15-31, page 13, lines 20-25, and page 16, lines 20-26.

Claims 1-20 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,330,071 to Vidyanand (hereinafter "Vidyanand").

Claim 1 recites, in part, an identifying apparatus communicating with the converting apparatus and operative to identify the static page layout objects in the manner allowing for an optimized form to be created, and to allow for appropriate merging with the variable print data, and an optimizer apparatus communicating with the identifying apparatus and operative to convert the static page layout objects to an optimized form, wherein optimization level to create the optimized form is based on intended usage of the static page layout objects by a user. Support to this claim feature may be found at least at page 6, lines 20-25, page 12, line 27 to page 13, line 9, and page 13, line 25 to page 14, line 21.

· Vidyanand discloses a variable data print job system that reduces master and variable jobs into a single job sent from a client to a printer that does not require infinite disk storage on the printer. A first part of the job includes master data and a second part of the job contain variable data, and the single print job is assembled with the sequential variable data pages placed immediately after their associated master pages in a serial fashion. See Vidyanand's Abstract and col. 4, lines 44-45.

However, Vidyanand fails to teach or suggest an identifying apparatus communicating with the converting apparatus and operative to identify the static page layout objects in the manner allowing for an optimized form to be created as recited in claim 1. The Office Action refers to Fig. 8 and col. 4, lines 48-56 of Vidyanand as teaching this claim feature. Applicants respectfully disagree in view of the following:

Vidyanand at the above recited portions merely discloses combining the two parts of a job into a single job sent to the printer. That is, the master data stored in a frame buffer is combined with variable data to create the single print job. There is no teaching or suggestion of an identifying apparatus communicating with a converting apparatus, and further, no optimized form is created using the static page layout objects, as recited in claim 1. Merely combining the master data with variable data is not the same as creating an optimized form from the static page layout objects, and then merging variable print data with the optimized form. In fact, Vidyanand fails to even make a mention of using the master data to create an optimized form from such data prior to combining the master data with the variable data.

In addition to the above, amended claim 1 further recites "wherein optimization level to create the optimized form is based on intended usage of the static page layout objects by a user." As Vidyanand fails to teach or suggest creating an optimized form, a subsequent step of level of optimization to create such optimized form does not even arise. Support to this amended claim feature may be found at least at page 6, lines 20-25.

In view of the foregoing, claim 1 is not anticipated by Vidyanand. Claim 1 is therefore in condition for allowance. As claims 2-9 depend from claim 1, they too are allowable. For example, claim 4 sets forth that the optimizer apparatus removes the static page layout objects that are not in an optimized form during the converting activity in order to recover memory. Col. 4, lines 20-32 of Vidyanand merely disclose recovering memory when a user deletes a job. As noted above, as Vidyanand does not create an optimized form, recovering memory upon determining that static page layout objects are not in an optimized form does not arise. Claim 6 further requires that the merging apparatus is operative to initialize the static page buffer with the optimized form of the static page layout objects in the raster form. Figs. 12-13 of Vidyanand merely disclose that variable data includes an index to master data, and nothing more. See col. 6, lines 16-25 of Vidyanand. Accordingly, claims 4 and 6 are patently distinguishable over Vidyanand for the additional reasons as set forth above.

Amended claims 10 and 15 are also allowable at least for the reasons set forth above with regard to claim 1. As claims 11-14 depend from claim 10, they too are in condition for allowance. As claims 16-20 depend from claim 15, they too are in condition for allowance.

New independent claim recites, in part, that individual ones of the static page layout objects include a field indicative of the intended use by the user, and that the field is used to determine the optimization level and to optimize storage of the static page layout objects. In addition to Vidyanand's deficiencies as set forth above with regard to claim 1, the above recited features of claim 21 are neither taught nor suggested by Vidyanand. Claim 21 is therefore allowable. As new claims 22-29 depend from amended claim 1, they too are in condition for allowance.

For all the reasons advanced above, Applicant respectfully submits that the application is in condition for allowance, and action to that end is respectfully requested. If the Examiner's next anticipated action is to be anything other than a Notice of Allowance, the undersigned respectfully requests a telephone interview before issuance of any such subsequent action.

Respectfully submitted,

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